

1 inside of the engine out.

2 Q. Was there a course work component?

3 A. I beg your pardon?

4 Q. Did you attend seminars or courses?

5 A. Yes e oh, yeah.

6 Q. What sort of seminars, what courses did you
7 take?

8 A. These were conducted in Peoria, Illinois, at
9 Caterpillar.

10 Q. How many?

11 A. Oh, through the years, it's probably been 25,
12 you know, as a product updates, updates classes
13 that are attended, product seminars every year.

14 MR. GRUNERT: Al, I've noticed
15 occasionally you start to answer the question
16 before Mr. Samito is quite finished answering
17 asking it, so try to give him a chance to finish
18 his question before you start to answer so the
19 stenographer doesn't have to try to take down
20 two people at once.

21 THE WITNESS: Okay.

22 Q. Do you have training or certifications
23 specifically regarding engine repair?

24 A. Yes.

1 Q. What certifications do you have regarding engine
2 repair?

3 A. During these certifications, complete overhaul,
4 disassembly and assembly are part of our
5 training and part of the knowledge required.

6 Q. During your training with Caterpillar, did you
7 ever have to disassemble an engine or reassemble
8 an engine?

9 A. Yes.

10 Q. Was that part of this?

11 A. Yes.

12 Q. How many times have you had to go through that?

13 A. Numerous times, too many to mention because
14 that's what I also trained with.

15 Q. Have you given any of these certification
16 seminars?

17 A. Yes.

18 Q. What ones have you given?

19 A. By engine model?

20 Q. Yes, yes.

21 A. 3406, the 3176, C10, C11, C12, C13, 3306, the
22 3126, 3116. That's enough models there to keep
23 you out of mischief.

24 Q. How many times have you given a seminar

1 regarding the 3176?

2 A. Probably ten times, at least, being
3 conservative.

4 Q. How many for the C12?

5 A. Equal amount.

6 Q. Were these seminars that you gave in Peoria or
7 do you travel around the country?

8 A. To our 48 TEPS dealers that I handle as part of
9 my job responsibility.

10 Q. In the New England area?

11 A. Yes.

12 Q. Where were these seminars held?

13 A. Either at our facility, and/or at the dealers.

14 Q. When you say our facility, does that mean?

15 A. Milton.

16 Q. At Milford?

17 A. Milford facility.

18 Q. Do you have any training or certifications
19 regarding engine design, outside of what you've
20 described?

21 A. No.

22 Q. Has Milton cat or Southworth-Milton provided you
23 any additional training or certifications
24 regarding Caterpillar products?

1 MR. GRUNERT: I would object to the form.

2 A. Yeah.

3 MR. SAMITO: Mark that as our next
4 exhibit.

5 (Exhibit No. 15, For Identification,
6 marked.)

7 Q. Looking at page S 000198.

8 A. Okay.

9 Q. It says on line 832 placed a call into CAT for
10 Al Cardoza to look at housing for warranty
11 purposes. Do you have any identify tee why in
12 this story it says placed a call into cat for Al
13 Cardoza?

14 A. To a TEPS dealer, Southworth-Milton is
15 Caterpillar in many cases, in their eyes. When
16 they're a Caterpillar dealer, they do not call
17 Peoria Illinois, they call directly to us and
18 I'm Mr. Caterpillar.

19 MR. SAMITO: Let's mark this as the next
20 exhibit.

21 (Exhibit No. 16, For Identification,
22 marked.)

23 Q. Looking at S 000280?

24 A. 288?